UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

CATHERINE DUKES, Individually and On Behalf of: All Others Similarly Situated,

Civil Action No. 1:04-cv-10315-PBS

Plaintiff,

Related Actions:

1:04-cv-10355-PBS VS.

> 1:04-cv-10405-PBS 1:04-cv-10408-PBS 1:04-cv-10534-PBS

1:04-cv-10555-MLW

1:04-cv-10567-MEL

1:04-cv-10603-PBS

COLUMBIA ACORN FUND. COLUMBIA ACORN SELECT, COLUMBIA ACORN USA, COLUMBIA

ASSET ALLOCATION FUND, COLUMBIA BALANCED FUND. COLUMBIA COMMON

STOCK FUND, COLUMBIA DISCIPLINED

VALUE FUND, COLUMBIA DIVIDEND INCOME

FUND. COLUMBIA GROWTH & INCOME FUND.

COLUMBIA GROWTH FUND, COLUMBIA

GROWTH STOCK FUND. COLUMBIA LARGE CAP CORE FUND, COLUMBIA LARGE CAP

GROWTH FUND, COLUMBIA LARGE

COMPANY INDEX FUND, COLUMBIA LIBERTY

FUND, COLUMBIA MID CAP GROWTH FUND,

COLUMBIA MID CAP VALUE FUND,

COLUMBIA REAL ESTATE EQUITY FUND,

COLUMBIA SMALL CAP FUND, COLUMBIA

SMALL CAP VALUE FUND, COLUMBIA SMALL COMPANY EQUITY FUND, COLUMBIA SMALL

COMPANY INDEX FUND, COLUMBIA

STRATEGIC INVESTOR FUND, COLUMBIA

TAX-MANAGED AGGRESSIVE GROWTH FUND, :

COLUMBIA TAX-MANAGED GROWTH FUND,

COLUMBIA TAX-MANAGED GROWTH FUND II, :

COLUMBIA TAX-MANAGED VALUE FUND,

COLUMBIA TECHNOLOGY FUND, COLUMBIA THERMOSTAT FUND, COLUMBIA UTILITIES

FUND, COLUMBIA YOUNG INVESTOR FUND,

COLUMBIA ACORN INTERNATIONAL FUND,

COLUMBIA ACORN INTERNATIONAL SELECT

FUND, COLUMBIA EUROPE FUND, COLUMBIA :

Caption Continues On Next Page

DECLARATION OF NANCY FREEMAN GANS IN SUPPORT OF THE MOTION OF THE COLUMBIA FUNDS LEAD PLAINTIFF MOVANTS FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF. APPOINTMENT OF STEERING COMMITTEE, APPROVAL OF SELECTION OF LEAD COUNSEL, COORDINDATING COUNSEL, AND LIAISON COUNSEL

GLOBAL EQUITY FUND, COLUMBIA INTERNATIONAL EQUITY FUND, COLUMBIA INTERNATIONAL STOCK FUND, COLUMBIA NEWPORT ASIA PACIFIC FUND. COLUMBIA NEWPORT JAPAN OPPORTUNITIES FUND, COLUMBIA NEWPORT GREATER CHINA FUND, COLUMBIA NEWPORT TIGER FUND, COLUMBIA CONTRARIAN INCOME FUND, COLUMBIA CORPORATE BOND FUND, COLUMBIA FEDERAL SECURITIES FUND, COLUMBIA FIXED INCOME SECURITIES FUND. COLUMBIA FLOATING RATE ADVANTAGE FUND, COLUMBIA FLOATING RATE FUND, COLUMBIA HIGH YIELD FUND, COLUMBIA HIGH YIELD OPPORTUNITY FUND, COLUMBIA INCOME FUND, COLUMBIA INTERMEDIATE BOND FUND, COLUMBIA INTERMEDIATE GOVERNMENT INCOME FUND, COLUMBIA MONEY MARKET FUND, COLUMBIA QUALITY PLUS BOND FUND, COLUMBIA SHORT TERM BOND FUND, COLUMBIA STRATEGIC INCOME FUND, COLUMBIA US TREASURY INDEX FUND, COLUMBIA CALIFORNIA TAX-EXEMPT FUND, COLUMBIA CONNECTICUT INTERMEDIATE MUNICIPAL BOND, COLUMBIA CONNECTICUT TAX-EXEMPT FUND. COLUMBIA FLORIDA INTERMEDIATE MUNICIPAL BOND FUND. COLUMBIA HIGH YIELD MUNICIPAL FUND, COLUMBIA INTERMEDIATE TAX-EXEMPT BOND FUND, COLUMBIA MANAGED MUNICIPALS FUND, COLUMBIA MASSACHUSETTS INTERMEDIATE MUNICIPAL BOND FUND, COLUMBIA MASSACHUSETTS TAX-EXEMPT FUND, COLUMBIA MUNICIPAL MONEY MARKET FUND, COLUMBIA NATIONAL MUNICIPAL BOND FUND, COLUMBIA NEW JERSEY INTERMEDIATE MUNICIPAL BOND FUND, COLUMBIA NEW YORK INTERMEDIATE MUNICIPAL BOND FUND, COLUMBIA NEW YORK TAX-EXEMPT FUND, COLUMBIA OREGON MUNICIPAL BOND FUND, COLUMBIA PENNSYLVANIA

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INTERMEDIATE MUNICIPAL BOND FUND, COLUMBIA RHODE ISLAND INTERMEDIATE MUNICIPAL BOND FUND, COLUMBIA TAX-EXEMPT FUND, COLUMBIA TAX-EXEMPT INSURED FUND, COLUMBIA SMALL CAP GROWTH FUND, COLUMBIA EUROPEAN THEMATIC EQUITY FUND, COLUMBIA GLOBAL THEMATIC EQUITY FUND, COLUMBIA DAILY INCOME COMPANY FUND (collectively known as "COLUMBIA FUNDS"); COLUMBIA ACORN TRUST, COLUMBIA BALANCED FUND INC./OR, COLUMBIA COMMON STOCK FUND INC., COLUMBIA DAILY INCOME COMPANY, COLUMBIA FIXED INCOME SECURITIES FUND INC., COLUMBIA FLOATING RATE ADVANTAGE FUND, COLUMBIA FLOATING RATE FUND, COLUMBIA FUNDS TRUST I, COLUMBIA FUNDS TRUST II, COLUMBIA FUNDS TRUST III, COLUMBIA FUNDS TRUST IV, COLUMBIA FUNDS TRUST IX, COLUMBIA FUNDS TRUST V, COLUMBIA FUNDS TRUST VI, COLUMBIA FUNDS TRUST VII, COLUMBIA FUNDS TRUST VIII, COLUMBIA FUNDS TRUST XI, COLUMBIA GROWTH FUND INC., COLUMBIA HIGH YEILD FUND INC., COLUMBIA INSTITUTIONAL FLOATING RATE INCOME FUND, COLUMBIA INTERNATIONAL STOCK FUND INC... COLUMBIA MID CAP GROWTH FUND INC., COLUMBIA OREGON MUNICIPAL BOND FUND INC., COLUMBIA NATIONAL MUNICIPAL BOND FUND INC., COLUMBIA REAL ESTATE EQUITY FUND INC., COLUMBIA SHORT TERM BOND FUND INC., COLUMBIA SMALL CAP GROWTH FUND INC., COLUMBIA STRATEGIC INVESTOR FUND INC., COLUMBIA TECHNOLOGY FUND INC. (collectively known as "COLUMBIA FUNDS REGISTRANTS"); FLEETBOSTON FINANCIAL CORPORATION; COLUMBIA MANAGEMENT GROUP, INC.: COLUMBIA MANAGEMENT ADVISORS, INC.; COLUMBIA WANGER ASSET MANAGEMENT, L.P.; COLUMBIA FUNDS DISTRIBUTOR, INC.; and JOHN DOES 1-100,

Defendants.

- I, Nancy Freeman Gans, under penalties of perjury, hereby declare:
- 1. I am a partner of Moulton & Gans, P.C. I submit this declaration in support of the motion of the Columbia Funds Lead Plaintiff Movants for Consolidation, Appointment As Lead Plaintiff, Appointment Of Steering Committee, And Approval of Selection of Lead Counsel, Coordinating Counsel, and Liaison Counsel.
- 2. Attached hereto as Exhibit A is a true and correct copy of a schedule of related actions against Columbia Funds that arise out of allegedly improper trading practices that are pending in this District and the Southern District of New York.
- 3. Attached hereto as Exhibit B is a true and correct copy of a schedule of related actions against Columbia Funds that are pending in this District and the Southern District of New York, and the claims asserted by each.
- 4. Attached hereto as Exhibit C is a list of the Columbia Funds Lead Plaintiff Movants.
- 5. Attached hereto as Exhibit D is a true and correct copy of the PSLRA notice published by the plaintiff in Dukes v. Columbia Acorn Fund, No. 04-CV-10315 (D. Mass. filed on Feb. 13, 2004) (Saris, J.), on *PR Newswire* on February 13, 2004.
- 6. Attached hereto as Exhibit E are true and accurate copies of the Columbia Funds Lead Plaintiff Movants' PSLRA certifications.
- 7. Attached hereto as Exhibit F is a true and accurate copy of the firm resume of Milberg Weiss Bershad Hynes & Lerach LLP.
- 8. Attached hereto as Exhibit G is a true and accurate copy of the firm resume of Moulton & Gans, P.C.
 - 9. Attached hereto as Exhibit H is a true and accurate copy of the Declaration of

Marc Vellrath, Ph.D., CFA, dated April 13, 2004.

DATED: April 13, 2004 Boston, Massachusetts

/s/ Nancy Freeman Gans Nancy Freeman Gans